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*Counsel for Defendants Hudson Group (HG) Retail, LLC  
and Airport Management Services, LLC*

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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MOHAMMED NABI and RIFAT RIZVI,	:	
<i>on behalf of themselves, FLSA Collective</i>	:	
<i>Plaintiffs and the Class,</i>	:	
	:	
Plaintiffs,	:	Case No. 14 CIV 4635 (VEC)
	:	
-against-	:	ECF Case
	:	
HUDSON GROUP (HG) RETAIL, LLC,	:	
AIRPORT MANAGEMENT	:	
SERVICES, LLC and JOHN DOES 1-10,	:	
	:	
Defendants.	:	
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**DECLARATION OF PHILLIP H. WANG, ESQ.**

I, Phillip H. Wang, Esq., declare as follows:

1. I am an attorney with the law firm DLA Piper LLP (US), counsel for Defendants Hudson Group (HG) Retail, LLC and Airport Management Services, LLC (collectively “Hudson” or “Defendants”), in the above-captioned action.

2. I submit this Declaration, which is based on my personal knowledge, in support of Defendants’ Memorandum of Law in Opposition to Mohammed Nabi (“Nabi”) and Rifat Rizvi’s (“Rizvi”) (collectively “Plaintiffs”) Motion for Conditional Collective Certification.

3. Attached hereto as Exhibit 1 are relevant pages from the October 7, 2014 deposition transcript of Plaintiff Mohammed Nabi.

4. Attached hereto as Exhibit 2 are relevant pages from the October 9, 2014 deposition transcript of Plaintiff Rifat Rizvi.

1           5.       Attached hereto as Exhibit 3 are relevant pages from the October 16, 2014  
2 deposition transcript of Mike Mullaney, Hudson's Executive Vice President of Strategy and  
3 Development.

4           6.       Attached hereto as Exhibit 4 are relevant pages from the October 16, 2014  
5 deposition transcript of Rick Yockelson, Hudson's Vice President of People & Administration.

6           7.       Attached hereto as Exhibit 5 is a true and correct copy of Plaintiffs' June 25, 2014  
7 Complaint.

8           8.       Attached hereto as Exhibit 6 are true and correct copies of Plaintiffs' executed and  
9 acknowledged wage statements (Notice and Acknowledgement of Pay Rate and Payday Under  
10 Section 195.1 of the New York State Labor Law).

11           9.       Attached hereto as Exhibit 7 is the sworn declaration of Sultana Ahmed, Office  
12 Manager at Hudson's Grand Central Station location.

13           10.      Attached hereto as Exhibit 8 is the sworn declaration of Daisy Begum, Office  
14 Manager/Bookkeeper at Hudson's Grand Central Station location.

15           11.      Attached hereto as Exhibit 9 is the sworn declaration of Kamlesh Desai,  
16 Operations Manager at Hudson's Penn Station location.

17           12.      Attached hereto as Exhibit 10 is the sworn declaration of Anna Drammeh,  
18 Operations Manager at Hudson's Penn Station location.

19           13.      Attached hereto as Exhibit 11 is the sworn declaration of Uditha Goonatilaka,  
20 Operations Manager at Hudson's Penn Station location.

21           14.      Attached hereto as Exhibit 12 is the sworn declaration of Maria Gutierrez,  
22 Assistant General Manager at Hudson's Grand Central Station location.

23           15.      Attached hereto as Exhibit 13 is the sworn declaration of Naeem Haider,  
24 Operations Manager at Hudson's Grand Central Station location.

1           16. Attached hereto as Exhibit 14 is the sworn declaration of Rajinder Kaur,  
2 Operations Manager at Hudson's Grand Central Station location.

3           17. Attached hereto as Exhibit 15 is the sworn declaration of Rafiqul Khander,  
4 Merchandise/Operations Manager at Hudson's Grand Central Station location.

5           18. Attached hereto as Exhibit 16 is the sworn declaration of Anna Kovalyk, Human  
6 Resources Manager and former Operations Manager at Hudson's Seattle-Tacoma Airport  
7 location.

8           19. Attached hereto as Exhibit 17 is the sworn declaration of Habib Mazumder,  
9 Operations Manager at Hudson's Grand Central Station location.

10           20. Attached hereto as Exhibit 18 is the sworn declaration of Yvonne Montero,  
11 Operations Manager at Hudson's Newark Airport location.

12           21. Attached hereto as Exhibit 19 is the sworn declaration of Mansoor Shah,  
13 Operations Manager at Hudson's Penn Station location.

14           22. Attached hereto as Exhibit 20 is the sworn declaration of Gurpreet Singh,  
15 Warehouse Manager at Hudson's Grand Central location.

16           23. Attached hereto as Exhibit 21 is the sworn declaration of Edwin Soto, General  
17 Manager at Hudson's Penn Station location.

18           24. Attached hereto as Exhibit 22 is the sworn declaration of Asim Syed, Operations  
19 Manager at Hudson's Penn Station location.

20           25. Attached hereto as Exhibit 23 is the sworn declaration of Gul Tariq,  
21 Books/Operations Manager at Hudson's Grand Central Station location.

22           26. Attached hereto as Exhibit 24 is the sworn declaration of Samuel Trani,  
23 Warehouse Manager at Hudson's Grand Central location.

